

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-03-043

THE FREEMAN CORPORATION

WINCHESTER, KY

May 17, 2004

RALPH E. GOSNEY, REVIEWER

Plant I.D. # 21-049-00004

Application Log # 54048

SOURCE DESCRIPTION:

A source-wide operating/construction permit application was received by the Division for Air Quality (DAQ) on August 7, 2001. The proposed construction was for an insignificant emission unit, EU-29, an Omeco wood dryer, and a significant emission unit, EU-13, a 28.7 mmBtu/hr Hurst wood boiler. The proposed dryer is under construction, and the proposed boiler has not been purchased, as of February 11, 2004. A letter was sent by DAQ on August 7, 2001 notifying the facility that the application was received and would be deemed complete within 60 days (October 7, 2001), if there were no deficiencies. On February 11, 2004, DAQ received additional information from the Freeman Corporation requesting a synthetic minor limit to avoid PSD.

The facility manufactures wood veneer products. Hardwood logs are stored, debarked, and trimmed before slicing operations to make veneer. Waste wood products are combusted in wood boilers. Heat from the boilers is used by dryers to dry the veneer.

The facility is a major source for carbon monoxide (CO) emissions and particulate matter less than 10 microns (PM₁₀). The source also has the potential to emit greater than 250 tons/yr of particulate matter (PM) and PM₁₀, as noted in Tables A-3 and A-4 of section 5 in the application. As a self imposed restriction to preclude the applicability of 401 KAR 51:017, the sum of all non-fugitive PM emissions from all existing sources prior to the application completion date of October 7, 2001 (emission units 05, 07-12, and 14-35) shall not exceed 240 tons/yr during any consecutive twelve (12) month rolling total. The sum of all non-fugitive PM₁₀ emissions, from all existing sources prior to the application completion date of October 7, 2001, shall not exceed 240 tons/yr during any consecutive twelve (12) month rolling total.

PUBLIC AND U.S. EPA REVIEW:

On April 8, 2004, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Winchester Sun* in Winchester, Kentucky. The public comment period expired 30 days from the date of publication. No comments were received during this period. The permit is now being issued as a proposed permit. The U.S. EPA has 45 days from the date of the issuance to submit comments. If no comments are received during this period, the Division will consider the permit final as conditioned.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997,

the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.